

EXHIBIT 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CELLULOSE MATERIAL SOLUTIONS,)
LLC,)
)
)
Plaintiff,)
)
vs.) Case No.
) 3:22-CV-03141-LB
SC MARKETING GROUP, INC.,)
)
Defendant.)
)

VIDEOTAPED DEPOSITION OF PAUL TURNER
30 (b) (6) deposition of Turner Fiberfill
Los Angeles, California
Thursday, September 14, 2023
Volume I

Stenographically Reported by:
AMANDA J. KALLAS
CSR Number 13901
Job Number 2624
PAGES 1 - 66

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CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
TURNER, PAUL 09/14/2023

30(b)(6), Job 25860

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2 NORTHERN DISTRICT OF CALIFORNIA
34 CELLULOSE MATERIAL SOLUTIONS,)
5 LLC,)
6 Plaintiff,)
7 vs.) Case No.
8 SC MARKETING GROUP, INC.,) 3:22-CV-03141-LB
9 Defendant.)
1011
12
13
14
15 Videotaped deposition of PAUL TURNER, Volume I,
16 taken on behalf of Plaintiff, at 633 West Fifth
17 Street, Suite 1550, Los Angeles, California
18 90071-2048, beginning at 9:38 a.m. and ending at
19 11:14 a.m. on Thursday, September 14, 2023, before
20 Amanda J. Kallas, Certified Shorthand Reporter
21 Number 13901.
22
23
24
25

1 MR. MITCHELL: This is Chris Mitchell from
2 Dickinson Wright.

3 MR. SMITH: And Ryan Smith from Wilson
4 Sonsini, on behalf of the defendant and the witness.

5 THE VIDEOGRAPHER: You may swear the witness.

6 ---oo---

7 PAUL TURNER,
8 having been duly administered an oath by the
9 court reporter, was examined and testified as
10 follows:

11 THE WITNESS: Yes I do.

12 THE STENOGRAPHER: Thank you.

13 Go ahead, Counsel.

14 ---oo---

15 EXAMINATION

16 BY MR. ROGGE:

17 Q Can you state your name for the --

18 A Paul --

19 Q -- record?

20 A -- Turner.

21 Q And what's your address?

22 A My home address?

23 Q Or the business address.

24 A Oh. 1600 Date Street, Montebello,
25 California.

1 A Polyester fiber blends.

2 Q And you also don't -- you don't know if
3 that's PET or what the spec is on that?

4 A What'd you call it?

5 Q "PET."

6 A In -- in our business realm, that -- we don't
7 refer to that. It may be. I don't know. It's all
8 called just "fiber."

9 Q Just "fiber"?

10 A Right. And in specific thicknesses and
11 deniers, so...

12 Q And the plastic polyethylene terephthalate --
13 that doesn't particularly mean anything to you?

14 A No.

15 Q Okay. How did you get the film? Who
16 supplied the film to you?

17 A TSS shipped it to us.

18 Q TSS shipped it directly to you?

19 A Correct.

20 Q They -- disregard.

21 Would -- is the batt a thermoplastic? Is
22 that --

23 A I never heard it to -- I've never heard it
24 referred to it as that.

25 Q You've never heard it referred to as that.

1 A 18, 20 years, something like that.

2 Q Close to the beginning of --

3 A Right, right.

4 Q -- the incorporation?

5 A Right.

6 Q How is the product priced? How is the
7 Renewliner priced?

8 A I don't understand what you mean.

9 Q Is it sold by weight or by volume?

10 A Well, the -- the cost of the product is by --
11 by weight. We buy it by the pound.

12 Q You buy the fibers by the pound?

13 A Correct.

14 Q Do you buy the --

15 A And then -- I'm sorry. Go on.

16 Q Continue. Continue, sir.

17 A No, no. And then we just convert it into
18 whatever the spec is.

19 Q You buy the fibers by the pound?

20 A Right.

21 Q Do you buy the film?

22 A No.

23 Q The film is provided by TSS?

24 A Correct.

25 Q How do you charge TSS? What do you charge

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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3
4 I, AMANDA KALLAS, C.S.R. Number 13901, in and for
5 the State of California, do hereby certify:

6 That prior to being examined, the witness named in
7 the foregoing deposition was by me duly sworn to testify
8 to the truth, the whole truth, and nothing but the truth;

9 That said deposition was taken down by me in
10 shorthand at the time and place therein named and
11 thereafter reduced to typewriting under my direction, and
12 the same is a true, correct, and complete transcript of
13 said proceedings;

14 That if the foregoing pertains to the original
15 transcript of a deposition in a federal case, before
16 completion of the proceedings, review of the transcript
17 { } was {x} was not required.

18 I further certify that I am not interested in the
19 event of this action.

20 Witness my hand this _____ 18th _____ day of
21 _____ September _____, 2023.

22
23 *Amanda Kallas*

24
25 AMANDA KALLAS, C.S.R. Number 13901

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